

# Compliance Assessment Sampling Plan – Undisclosed Antidumping/Countervailing Duties

CAT KIT Exhibit 14B

Attribute, Test, Error(s) & Criteria	Sampling Parameters	Universe	Potential Sampling Frame(s)	Evaluation of Compliance Testing & Actions Needed
<p><b>Attribute:</b> Was merchandise correctly entered in accordance with 19 U.S.C. 1673 (ADD), 19 U.S.C. 1671 (CVD) and 19 CFR Part 353, Chapter 3?</p> <p><b>Test (Primary Audit Steps):</b></p> <ol style="list-style-type: none"> <li>(1) Identify ADD/CVD merchandise and develop specific audit steps for the import specialist to test compliance with ADD/CVD.</li> <li>(2) Determine if the company's internal control policies and procedures for ADD/CVD were <ul style="list-style-type: none"> <li>• Documented, and</li> <li>• Prevented undisclosed ADD/CVD entries.</li> </ul> </li> </ol> <p><b>Errors:</b> Merchandise was not correctly entered in accordance with 19 U.S.C. 1673 (ADD), 19 U.S.C. 1671 (CVD) and 19 CFR Part 353, Chapter 3.</p> <p><b>Criteria for Testing (Statistical Sample or 100% Review):</b> CAT determines that the trade area is a high risk trade area.</p>	<p><b>Approach:</b> Attribute Discovery Sampling</p> <p>If any error is found, stop testing and discuss with CAT members.</p> <p><b>Critical Error Rate:</b> 5%</p> <p><b>Government Risk:</b> 1%</p> <p><b>Confidence Level:</b> 99%</p>	<p>Merchandise that is potentially subject to ADD/CVD for Customs entries made during the importer's last completed fiscal year</p>	<p><b>Customs' Records:</b> Line items for merchandise that is potentially subject to ADD/CVD</p> <ul style="list-style-type: none"> <li>• tariff numbers that historically included ADD/CVD merchandise that were not properly claimed</li> <li>• manufacturers or countries that historically produced ADD/CVD merchandise</li> </ul> <p>(Note: 03 entries should also be reviewed to determine if the correct case number was utilized. Consider a separate sample of 03 entries – see Exhibit 14A).</p> <p><b>Importer's Records:</b></p> <ul style="list-style-type: none"> <li>• Payments to specific manufacturers potentially subject to ADD/CVD</li> <li>• Current inventory listing of articles (obtain descriptions and specifications)</li> </ul> <p><b>Sampling Frame:</b> _____</p> <p><b>Validated Sample:</b></p> <p>Yes No</p> <p><b>Frame Size:</b> _____</p> <p><b>Sample Size:</b> _____</p>	<p><b>No Errors</b></p> <ul style="list-style-type: none"> <li>– If internal controls were documented, compliance is at an acceptable level for undisclosed ADD/CVD.</li> <li>– If internal controls were not documented, coordinate with the Account Manager to help company develop a CIP.</li> </ul> <p><b>Errors are Identified</b></p> <ul style="list-style-type: none"> <li>– Discuss with CAT members the best course of action, (i.e. audit, investigation, etc.)</li> <li>– Discuss with STC special agent</li> <li>– Further action depends on individual circumstances</li> </ul>